

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No. 1:22-cv-11851

F.B.,
G.G.

Plaintiffs

vs.

MELVIS C. ROMERO, ET AL.
Defendant

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)
)
)
)
)

DEFENDANT, MELVIS ROMERO'S ANSWER
TO PLAINTIFFS' COMPLAINT

INTRODUCTION

1. The defendant (hereinafter "Romero") denies so much of this Paragraph as it alleges that he repeatedly assaulted the two plaintiffs.
2. Romero denies the allegations contained in Paragraph 2 of plaintiffs' Complaint.
3. Romero denies the allegations contained in Paragraph 3 of plaintiffs' Complaint.
4. Romero denies the allegations that he sexually abused four women over fifty (50) occasions.
5. Romero denies the allegations in Paragraph 5.
6. Romero denies the allegations contained in Paragraph 6.
7. Romero denies the allegations contained in Paragraph 7.
8. Romero denies the allegations contained in Paragraph 8.
9. Romero denies the allegations contained in Paragraph 9.
10. Romero denies the allegations contained in Paragraph 10.
11. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 11.
12. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 12.

13. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 13.
14. Romero admits the allegations contained in Paragraph 14.
15. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 15.
16. Romero denies the allegations contained in Paragraph 16.
17. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 17.
18. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 18.
19. Romero is unaware of responsibilities of other named defendants.
20. Romero does not have sufficient knowledge to admit nor deny the allegations contained in Paragraph 20.
21. Romero neither admits nor denies statements made in this paragraph.
22. Romero does not have sufficient knowledge to admit nor deny the allegations contained in Paragraph 22.
23. Romero neither admits nor denies the allegations contained in Paragraph 23 as paragraph does not require one.

PARTIES

- 24-25. Romero admits the allegations contained in Paragraphs 24-25.
26. Romero admits being a prison guard employed by the Department of Corrections at all relevant times. Romero denies all other allegations contained in this Paragraph.
- 27-42. Romero does not have sufficient information or knowledge to admit or deny the allegations contained in these paragraphs.

Romero neither admits nor denies the allegations contained in Paragraphs 41 and 42 inasmuch as he does not have information sufficient to respond.
43. Romero is not aware of the responsibility of any of the other defendants and therefore neither admits nor denies the allegations contained in Paragraph 43 of the Complaint.
44. Admitted.
45. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 45 of plaintiffs' Complaint.

46. Romero neither does not have sufficient information to admit or deny the allegations contained in Paragraph 46 of plaintiffs' Complaint inasmuch as he is unaware of the knowledge of the other defendants.
47. Romero neither admits nor denies the allegations contained in Paragraph 47 of plaintiffs' Complaint inasmuch as he is unaware of the knowledge of the other defendants.
- 48-52. Romero neither admits nor denies the allegations contained in Paragraphs 48-52 of plaintiffs' Complaint inasmuch as he is unaware of the knowledge of the other defendants.
53. Romero admits the allegations contained in Paragraph 53 of plaintiffs' Complaint.
54. Romero is unaware of such publications.
55. Romero is unaware of any such knowledge.
56. Romero only knew GG by name and was unaware of F.B.'s identity.
57. Romero denies having such knowledge.
58. Romero is not familiar with the term risk-housing-tool.
59. Romero does not have sufficient information to admit nor deny the allegations contained in Paragraph 59 of plaintiffs' Complaint.
60. Romero was unaware of the risk management tool.
- 61-62. Romero does not have sufficient information to admit or deny the allegations contained in Paragraphs 61 and 62 of plaintiffs' Complaint.
63. Romero admits the allegations contained in Paragraph 63 of plaintiffs' Complaint.
64. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 64.
65. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 65.
66. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 66.
67. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 67.
68. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 68.

69. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 69.
70. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 70.
71. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 71.
72. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 72.
73. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 73.
74. Romero does not have sufficient knowledge to admit or deny the allegations contained in Paragraph 74.
75. Romero admits the allegations contained in Paragraph 75.
76. Romero denies being placed on notice of said security vulnerabilities at MCI Framingham.
77. Romero does not have sufficient information to admit or deny allegations of this paragraph and sub paragraph.
78. Romero admits the allegations contained in Paragraph 78.
79. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 79.
80. Romero admits the allegations contained in Paragraph 80.
81. Romero denies the allegations contained in Paragraph 81 inasmuch as the officers and supervisors made security rounds whether or not Romero was working.
82. Romero denies the allegations contained in Paragraph 82 of plaintiffs' Complaint.
83. Romero denies the allegations contained in Paragraph 83 of plaintiffs' Complaint.
84. Romero denies the allegations contained in Paragraph 84 of plaintiffs' Complaint.
85. Romero denies the allegations contained in Paragraph 85 of plaintiffs' Complaint.
86. Romero denies the allegations contained in Paragraph 86 of plaintiffs' Complaint.
87. Romero denies the allegations contained in Paragraph 87 of plaintiffs' Complaint.

88. Romero denies the allegations contained in Paragraph 88 of plaintiffs' Complaint.
89. Romero denies the allegations contained in Paragraph 89 of plaintiffs' Complaint.
90. Romero denies the allegations contained in Paragraph 90 of plaintiffs' Complaint.
91. Romero denies the allegations contained in Paragraph 91 of plaintiffs' Complaint.
92. Romero denies the allegations contained in Paragraph 92 of plaintiffs' Complaint.
93. Romero denies the allegations contained in Paragraph 93 of plaintiffs' Complaint.
- 94-95. Romero denies the allegations contained in Paragraphs 94-95 of plaintiffs' Complaint. Her location and movements were documented when required.
96. Romero denies the allegations contained in Paragraph 96 of plaintiffs' complaint.
97. Romero denies the allegations contained in Paragraph 97 of plaintiffs' Complaint.
98. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 98.
99. Romero denies the allegations contained in Paragraph 99 of plaintiffs' Complaint.
100. Romero denies the allegations contained in Paragraph 100 of plaintiffs' Complaint.
101. Romero denies the allegations contained in Paragraph 101 of plaintiff's Complaint.
102. Romero denies the allegations contained in Paragraph 102 of plaintiffs' Complaint.
103. Romero denies the allegations contained in Paragraph 103 of plaintiffs' Complaint.
104. Romero denies the allegations contained in Paragraph 104 of plaintiffs' Complaint.
105. Romero denies the allegations contained in Paragraph 105 of plaintiffs' Complaint.
106. Romero denies the allegations contained in Paragraph 106 of plaintiffs' Complaint.
107. Romero denies the allegations contained in Paragraph 107 of plaintiffs' Complaint.
108. Romero denies the allegations contained in Paragraph 108 of plaintiffs' Complaint.
109. Romero is unaware of Ms. B's beliefs.
110. Romero is unaware of Ms. B's beliefs.
111. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 111.

112. Romero denies the allegations contained in Paragraph 112 of plaintiffs' complaint.
113. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 113.
114. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 114.
115. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 115.
116. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 116.
117. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 117.
- 118-122. Romero does not have sufficient information to admit or deny the allegations contained in Paragraphs 118-122.
123. Romero denies the allegations contained in Paragraph 123 of plaintiffs' Complaint.
124. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 124.
125. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 125.
126. Romero was not aware of interview referenced herein but admits that he was permitted to return to MCI Framingham.
127. Romero could see her in a "bubble" but could not communicate.
128. Romero denies the allegations contained in Paragraph 128 of plaintiffs' complaint.
129. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 129.
130. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 130.
131. Romero admits the allegations contained in Paragraph 131.
- 132-143. Romero does not have sufficient information to admit or deny the allegations contained in Paragraphs 132-143.
144. Romero admits the allegations contained in Paragraph 144.

- 145-148. Romero denies the allegations contained in Paragraphs 145-148 of plaintiffs' Complaint.
149. Romero denies the allegations contained in Paragraph 149 of plaintiffs' Complaint.
- 150-154. Romero denies the allegations contained in Paragraphs 150-154 of plaintiffs' Complaint.
155. Romero has no information as to her beliefs.
156. Romero denies the allegations contained in Paragraph 156 of plaintiffs' Complaint.
157. Romero denies the allegations contained in Paragraph 157 of plaintiffs' Complaint.
158. Romero denies the allegations contained in Paragraph 158 of plaintiffs' Complaint.
159. Romero was only required to account for her movements in certain areas and does not have sufficient information to admit or deny the further allegations contained in Paragraph 159 of plaintiffs' Complaint.
160. Romero admits the allegations contained in Paragraph 160.
161. Romero denies the allegations contained in Paragraph 161 of plaintiffs' Complaint.
162. Romero denies the allegations contained in Paragraph 162 of plaintiffs' Complaint.
163. Romero denies the allegations contained in Paragraph 163 of plaintiffs' Complaint.
164. Romero is unaware of Ms. BG's beliefs.
165. Romero denies the allegations contained in Paragraph 165 of plaintiffs' Complaint.
166. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 166.
167. Romero denies the allegations contained in Paragraph 167 of plaintiffs' Complaint.
168. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 168.
169. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 169.
- 170 (a-d.) Romero is unaware of the conduct of other defendants and neither admits nor denies the allegations contained in Paragraph 170 (a-d) of plaintiffs' Complaint.
171. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 171 of plaintiffs' Complaint.

- 172-175. Romero does not have sufficient information to admit or deny the allegations contained in Paragraphs 172-175.
- 176-177. Romero does not have knowledge of Ms. G's awareness and therefore neither admits nor denies this allegation in Paragraphs 176-177.
- 178-181- Romero does not have sufficient information to admit or deny the allegations contained in Paragraphs 178-181.
182. Romero is not aware of what each individual defendant had knowledge of and therefore neither admits nor denies the allegations contained in Paragraph 182.
- 183-187. Romero does not have sufficient information to admit or deny the allegations contained in Paragraphs 183-187.
- 188 (a-k) Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 188 (a-k).
189. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 189.
190. Romero denies the allegations contained in Paragraph 190 of plaintiffs' Complaint.
- 191-197. Romero does not have sufficient information to admit or deny the allegations contained in Paragraphs 191-197.
198. Romero does not have sufficient information to admit or deny the allegations contained in Paragraph 198.
- 200-202. Romero does not have sufficient information to admit or deny the allegations contained in Paragraphs 200-202.
- 203-211. Romero does not have sufficient information to admit or deny the allegations contained in Paragraphs 203-211.

STATEMENT OF JURISDICTION

- 212-216. Romero acknowledges the jurisdiction of this Court in this case.

COUNT I

217. Romero realleges and reasserts the answers contained in the proceeding paragraphs as fully set forth herein.
218. Romero admits the allegations contained in Paragraph 218.
219. Romero denies the allegations contained in Paragraph 219.
220. Romero neither admits nor denies the allegations contained in Paragraph 220.

221. Romero admits the allegation contained in Paragraph 221 of plaintiffs' Complaint.
- 222-224. Romero denies the allegations contained in Paragraphs 222-224 of plaintiffs' Complaint.

COUNT II

225. Romero realleges and reasserts the answers contained in the proceeding paragraphs as fully set forth herein.
- 226-238. Romero is not named in this count and therefore neither admits nor denies the allegations contained in the proceedings has no reason to answer.

COUNT III

- 239-245. Romero is not named in this count and therefore neither admits nor denies the allegations contained in the relevant paragraphs.

COUNT IV

246. Romero realleges and reasserts the answers contained in the proceeding paragraphs as fully set forth herein.
- 247-255. Romero neither admits nor denies the allegations contained in the relevant paragraphs.

COUNT V

256. Romero realleges and reasserts the answers contained in the preceding paragraphs as fully set forth herein.
- 257-258. Romero denies the allegations contained in Paragraphs 257-258 of plaintiffs' Complaint.

COUNT VI

259. Romero realleges and reasserts the answers contained in the preceding paragraphs as fully set forth herein.
- 260-261. Romero denies the allegations contained in Paragraphs 260-261 of plaintiffs' Complaint.

COUNT VII

262. Romero realleges and reasserts the answers contained in the preceding paragraphs as fully set forth herein.

263-265. Romero denies the allegations contained in Paragraphs 263-265 of plaintiff's Complaint.

DEMAND FOR DECLARATORY JUDGMENT

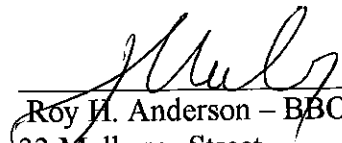
266. Romero contends that he has no standing to address the plaintiffs' demands for declaratory judgment and proposed remedies and does not oppose the plaintiffs' demand for declaratory judgment as stated in Paragraph 266 Sections a-j and takes no position as to plaintiffs' request.

WHEREFORE, Romero requests this Court enters judgment in his favor in all counts of The Complaint.

Dated: December 1, 2022

THE DEFENDANT
MELVIS ROMERO,

BY:



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CERTIFICATE OF SERVICE

I, Roy H. Anderson, attorney for the defendant Melvis C. Romero, certify that I have served a copy of the enclosed Defendant, Melvis Romero Answer to Plaintiffs' Complaint upon plaintiffs' attorney by electronically mailing a copy to: Zachary Lown, Esquire and J. Connie Tran, Esquire, 50 Congress Street, Suite 600, Boston, MA 02109 this 1st day of December, 2022.

December 1, 2022

BY:



Roy H. Anderson, Esquire